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Formed in the State of PA
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ATTORNEY FOR MOVANT: EXETER FINANCE, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE:	§	CASE NO. 18-30831-JNP
	§	
JOSEPH J. ENNIS, JR., Debtor	§	CHAPTER 13
	§	
	§	Hearing date: November 26, 2019@10:00
	§	A.M.
	§	
	§	<u>NOTICE OF MOTION TO VACATE</u>
	§	<u>AUTOMATIC STAY</u>

TO:

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PLEASE TAKE NOTICE that on **Tuesday, November 26, 2019 at 10:00 A.M.**, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor **Exeter Finance, LLC** its assignees and/or successors in interest, will move before the Honorable Jerrold N. Poslusny Jr. of the United States Bankruptcy Court, 400 Cooper Street, Camden, NJ 08101 for the entry of an *Order Vacating the Automatic Stay* with respect to Debtor's 2008 BMW 5 Series Sedan 4D 528xi AWD, V.I.N. WBANV13598CZ53107, and allowing Exeter Finance, LLC to continue or institute a repossession action, by reason of the Debtor's failure to make regular monthly payments to Exeter Finance, LLC.

Dated : November 04, 2019

Respectfully Submitted,

Mester & Schwartz, P.C.
Attorney for Movant

/s/ Jason Brett Schwartz, Esquire
Jason Brett Schwartz, Esquire